

¹ References to the “Plan” herein refer to the Debtors’ Joint Chapter 11 Plan of Reorganization of 21st Century Oncology Holdings, Inc. and its Debtor Affiliates (as modified, amended, or supplemented).

Unexpired Leases (the “*Assumption Schedule*”). In the Assumption Schedule, the Debtors listed a Building and Land Lease with ESJ that is to be assumed by the Debtors (“*Lease*”).

2. On November 18, 2017, ESJ received a copy of the Debtors’ *Notice of (A) Executory Contracts and Unexpired Leases to Be Assumed or Assumed and Assigned by the Debtors Pursuant to the Plan (B) Cure Amounts, If Any, and (C) Related Procedures in Connection Therewith* (the “*Notice*”).

3. ESJ is not objecting to the confirmation of the Plan or the assumption (or assumption and assignment) of the Lease by the Debtors. However, the Notice states that if no cure amount is listed for a particular executory contract or unexpired lease, then the Debtors believe no cure amount is outstanding.

4. Contrary to Debtors’ belief, and the “zero dollar” cure amount that the Debtors listed in the Notice, ESJ is owed \$6,781.54 for 2016 taxes that are due under the Lease. A copy of ESJ’s invoice to the Debtors reflecting the amount due (which was previously provided to the Debtors) is annexed hereto as Exhibit A.

5. In addition to the cure amount of \$6,781.54 referenced above, ESJ is also entitled to reasonable attorneys fees that have been incurred under the Lease. These attorneys’ fees amount to \$2,000.

6. In sum, the total cure amount owed to ESJ is \$8,781.54.

7. Because the Debtors seemingly intend to avoid payment of this cure amount, ESJ objects to the assumption (or assumption and assignment) of the Lease.

Dated: November 27, 2017

Respectfully submitted,

DAL LAGO LAW

/s/ Michael R. Dal Lago
MICHAEL R. DAL LAGO

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*Counsel for Creditor, Colonial Bldg. 3 of
Naples, Inc. a/k/a ESJ VII, LLC*

CERTIFICATE OF SERVICE

I CERTIFY that on this 27th day of November, 2017 a true and correct copy of the foregoing was served electronically through the Court's CM/ECF Noticing system on all parties registered for electronic service including **Counsel for the Debtor, Christopher Marcus, Esq. and John Thomas Weber, Esq.**, Kirkland & Ellis LLP, 601 Lexington Avenue, New York, NY 10022; and **United States Trustee**, Office of the United States Trustee, U.S. Federal Office Building, 201 Varick Street, Room 1006, New York, NY 10014.

/s/ Michael R. Dal Lago
MICHAEL R. DAL LAGO
New York Bar No. 3988888

EXHIBIT A

Colonial Bldg. 3 of Naples, Inc.
c/o KOVA Property Management, LLC, PO Box 110876
Naples, FL, 34108

Statement

Account colo3 102 esj
Prop Name Colonial Building 3 Condominium
Assigned 102

Date 3/24/2017
Payment \$ _____

ESJ VII, LLC
2485 Lantern Lane
Naples, FL 34102

| Date | Description | Unit | Ctrl | Charges | Payments | Balance |
|------------|----------------------------------|------|----------|----------|----------|----------|
| 01/01/2017 | Association Fees (01/2017) | 102 | C-142125 | 5,639.96 | | 5,639.96 |
| 01/01/2017 | Reserves (01/2017) | 102 | C-142126 | 1,392.02 | | 7,031.98 |
| 01/05/2017 | Chk# 014906 - :CHECKscan Payment | | R-41408 | | 7,031.98 | 0.00 |
| 03/21/2017 | 1Q Revised Billing | 102 | C-145968 | 204.64 | | 204.64 |
| 03/21/2017 | 1Q Revised Billing | 102 | C-145969 | -72.00 | | 132.64 |
| 04/01/2017 | Association Fees (04/2017) | 102 | C-147162 | 5,844.60 | | 5,977.24 |
| 04/01/2017 | Reserves (04/2017) | 102 | C-147163 | 1,320.02 | | 7,297.26 |

| 30 Days | 31-60 Days | 61-90 Days | Above 90 Days | Amount Due |
|---------|------------|------------|---------------|------------|
| 54.62 | 132.64 | 0.00 | 0.00 | 7,297.26 |